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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 IN RE: OSCAR D. TERAN, Debtor

Bankruptcy No. 10-31718 DM  
Chapter 7

14 OSCAR D. TERAN, on behalf of himself and  
15 all those similarly situated,

Adversary No. 20-03075

16 Plaintiffs,

17 v.

18 NAVIENT SOLUTIONS, LLC, NAVIENT  
19 CREDIT FINANCE CORPORATION,

**RESPONSE OF STEPHANIE  
MAZLOOM AND ROBERT AND  
MOLLY CRANDALL TO PLAINTIFF'S  
STATEMENT OF RECENT  
DEVELOPMENT IN SUPPORT OF  
PLAINTIFF'S MOTION FOR CLASS  
CERTIFICATION (ECF NO. 122)**

20 Defendants.

Hon. Dennis Montali

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Adversary No. 20-03075

RESPONSE OF STEPHANIE MAZLOOM AND ROBERT AND MOLLY CRANDALL TO PLAINTIFF'S  
STATEMENT OF RECENT DEVELOPMENT IN SUPPORT OF PLAINTIFF'S MOTION FOR CLASS  
CERTIFICATION (ECF NO. 122)

1 On March 14, 2023, Plaintiff filed a notice with the Court, noting the recent decision of the  
2 Bankruptcy Court for the District of Nebraska in *Woodard v. Navient Solutions, LLC*, Adv. No.  
3 21-8023-TLS (Mar. 8, 2023), in which the bankruptcy court certified a class of individuals with  
4 private loans to Navient, covering the Eighth Circuit. Plaintiff suggests that the relief that was  
5 provided in *Woodard* is “similar to the class of consumers at issue in Mr. Teran’s motion for class  
6 certification.” Dkt. No. 122 at 2. However, there is a substantial difference between the two  
7 classes. In *Woodard*, brought by the undersigned counsel, the requested relief includes both  
8 monetary and injunctive relief for the entire class, without any of the claim splitting that is at issue  
9 here. In this case, unlike *Woodard*, Plaintiff seeks a national injunctive class with no monetary  
10 relief.  
11

12 The undersigned also wishes to advise the Court that, in a hearing held on February 28,  
13 2023, in *Mazloom v. Navient Solutions, LLC*, Adv. Pro. No. 20-80033 (Bankr. N.D.N.Y.), the  
14 bankruptcy court granted the motion of Robert and Molly Crandall to intervene as plaintiffs and  
15 class representatives, and the undersigned anticipates that a motion seeking certification of a  
16 national monetary and injunctive class will be filed soon after the order on intervention is entered.  
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Dated: March 16, 2023

Respectfully submitted,  
**BOIES SCHILLER FLEXNER LLP**

By: /s/ Sean P. Rodriguez  
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